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4 WASHOE COUNTY SCHOOL DISTRICT

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7 Washoe County School District, Kirsten McNeill, and Michael Paul

8 UNITED STATES DISTRICT COURT

9 IN AND FOR THE DISTRICT OF NEVADA

10 L.G. a minor, by and through his parent and
natural guardian JEFF GORELICK;

11 Plaintiff,

12 vs.

13 WASHOE COUNTY SCHOOL DISTRICT,
14 a political subdivision of the State of Nevada;
Superintendent KRISTEN MCNEILL; and
15 Washoe County School District Area
Superintendent MICHAEL PAUL;

16 Defendants.

CASE NO.: 3:22-cv-00228-MMD-CLB

STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT
(First Request)

17 _____ /

18 COMES NOW, Plaintiff L.G. a minor, by and through his parent and natural guardian

19 JEFF GORELICK and Defendants Washoe County School District, Superintendent KRISTEN

20 MCNEILL, and Washoe County School District Area Superintendent MICHAEL PAUL

21 (hereinafter referred to collectively as the Parties), by and through their respective counsel of

22 record, and hereby stipulate and agree, pursuant to Federal Rules of Civil Procedure 6(b) and

23 Civil Local Rule IA 6-1, to extend the deadline for Defendants' answer or response to Plaintiffs'

24 Complaint to June 28, 2022. This Stipulation is based on the following:

1 1. Plaintiffs served their Verified Complaint for Declaratory and Injunctive Relief
2 for Violation of the Fourth and Fourteenth Amendments to the United States Constitution
3 (Complaint) on May 24, 2022 (ECF No. 1).

4 2. This Stipulation is based on the Parties' ongoing settlement efforts to resolve the
5 matter informally.

6 3. On June 3, 2022, the Parties engaged in a informal settlement conference. The
7 settlement conference was successful, and the Parties reached an agreement in principle that will
8 resolve all Plaintiffs' claims and, once finalized, will eventually lead to Plaintiffs' voluntarily
9 dismissal of their Complaint.

10 4. The Parties agree and stipulate that it is in their mutual best interest to extend the
11 deadline for Defendants' answer or response to Plaintiffs' Complaint, as finalizing the agreement
12 in principle and Plaintiffs' withdrawal of their Complaint would obviate the need for further
13 litigation in this matter.

14 5. The Parties agree that if they fail to finalize their agreement in principle, it will be
15 necessary for them to resume their litigation efforts. Thus, the Parties stipulate and agree to extend
16 the deadline for Defendants' answer or response to Plaintiffs' Complaint to June 28, 2022.

17 6. This Stipulation is made in good faith and is not for the purposes of delay.

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7. This is the Parties' first request for extension of the scheduled discovery deadlines.

DATED this 9th day of June, 2022.

DATED this 9th day of June, 2022.

LUKE ANDREW BUSBY, LTD.

OFFICE OF THE GENERAL COUNSEL
WASHOE COUNTY SCHOOL DISTRICT

By: /s/Luke Andrew Busby, Esq

By: /s/Sara K. Montalvo, Esq

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Attorneys for Defendants

IT IS SO ORDERED:

DATED: June 9, 2022


UNITED STATES MAGISTRATE JUDGE